

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

IN RE: TAMMY D. LOWE,	{ CHAPTER 13
	{
	{
DEBTOR(S)	{ CASE NO. R19-42612-BEM
	{
	{ JUDGE ELLIS-MONRO

OBJECTION TO CONFIRMATION

COMES NOW Mary Ida Townson, TRUSTEE herein, and objects to Confirmation of the plan for the following reasons:

1. The Debtor(s)' payments under the proposed plan are not current.

2. The Debtor(s) has failed to provide the Trustee with a copy of the federal tax return or transcript of such return for the most recent tax year ending immediately before the commencement of the instant case and for which a federal income tax return was filed, in violation of 11 U.S.C. Section 521(e)(2)(A)(i).

3. Pursuant to the testimony at the meeting of creditors, it appears that Debtor is presently unemployed causing the present plan and budget to be infeasible, in violation of 11 U.S.C. Section 1325(a)(6).

4. After review of scheduled income and anticipated household expenses, Debtor(s)' proposed budget may fail to provide sufficient funds for ordinary living expenses, in possible violation of 11 U.S.C. Section 1325(a)(6).

5. The Debtor(s)' Schedule I fails to accurately reflect non-filing spouse's income thereby preventing the Chapter 13 Trustee from determining the feasibility of the proposed plan, in violation of 11 U.S.C. Section 11 U.S.C. Section 1325 (a)(6).

6. The Debtor(s)' plan does not provide for payment of all of the Debtor(s)' disposable income to the Trustee for thirty-six (36) or more months as required by 11 U.S.C. Section 1325(b)(1)(B).

Mary Ida Townson, Chapter 13 Trustee
285 Peachtree Center Ave, Suite 1600
Atlanta, GA 30303
404-525-1110
maryidat@atlchl3tt.com

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny confirmation of this Debtor's(s') Plan and to dismiss the case; or, in the alternative, convert the case to one under Chapter 7.

January 14, 2020

/s
Mary Ida Townson, Esq.
Chapter 13 Trustee
GA Bar No. 715063

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CERTIFICATE OF SERVICE

This is to certify that on this day I caused a copy of the foregoing pleading to be served via United States First Class Mail, with adequate postage thereon, on the following parties at the address shown for each:

DEBTOR(S):

TAMMY D. LOWE
233 QUINN DR
ROCKY FACE, GA 30740-9810

I further certify that I have on this day electronically filed the pleading using the Bankruptcy Court's Electronic Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

SAEGER & ASSOCIATES

This 14th day of January, 2020

/s/

Mary Ida Townson
Standing Chapter 13 Trustee
GA Bar No. 715063

Mary Ida Townson, Chapter 13 Trustee
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